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MANAGING NJ ATTORNEY
CERTIFIED CIVIL TRIAL ATTORNEY

May 19, 2021

Via email only

The Honorable Brian Martinotti
United States District Court of New Jersey
Clarkson S. Fisher Bldg & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

RE: *Kimberlee Williams, et al. v. BASF Catalysts LLC, et al.*
Civil Action No. 11-cv-01754 (JLL) (JAD)

Dear Judge Martinotti:

Counsel have met and conferred regarding the schedule for completing Claims Administration leading up to the Fairness Hearing which has been rescheduled for September 23, 2021. We have agreed to extend the date for the parties to exercise their walk-away rights by one week from the Claims Determination Deadline. Accordingly, the schedule, if approved by Your Honor, is as follows:

Claims Filing Deadline	Tuesday, March 16, 2021
Claims Filing First Review Complete *	Friday, April 30, 2021
Document Submission Deadline	Thursday, May 20, 2021
Claims Determination Deadline, Anti-Fraud Audit Sample Chosen	Monday, May 31, 2021
Defendants' and Class Reps Walk-Away Rights Expire	Monday, June 07, 2021
D review request deadline	Friday, July 30, 2021
Objection Response Deadline	Friday, July 30, 2021
Anti Fraud Audit Deadline	Thursday, August 19, 2021
Motion for Final Approval	Thursday, August 19, 2021
Fairness Hearing; Final Approval (Assuming Judge Rules from Bench)	Thursday, September 23, 2021

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Respectfully,

/s/ *Christopher M. Placitella*

CHRISTOPHER M. PLACITELLA

CMP/bd

cc: *Via email only*

Eugene F. Assaf, Esquire

Nina M. Gussack, Esquire

Hon. Marina Corodemus, Ret'd.

Jennifer Fiore, Judicial Clerk

It is further ordered the motion for attorney fees [cm/ecf #628] will be administratively terminated and addressed at the fairness hearing. If supplemental briefing is required for the attorney fees motion, parties shall file same no later than 7 days prior to the proof hearing.

SO ORDERED:



BRIAN R. MARTINOTTI, USDJ

Dated: May 21, 2021